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**Admitted to practice in NY, N.D.N.Y., W.D.N.Y.,
2d & 4th Cir., U.S. Supreme Court*

January 6, 2025

Hon. Brenda K. Sannes
United States District Court
Northern District of New York
100 South Clinton Street
Syracuse, New York 13261

via CM/ECF

Re: Nadine Gazzola, et al. v. Gov. Kathleen Hochul, et al.
Case No. 1:22-cv-1134 (BKS/DJS)

To the Hon. Brenda K. Sannes:

This correspondence is written with approval of Counsel to request the following be
“so ordered,” as follows:

1. Withdrawal of Plaintiff, Mr. Robert Owens, from this litigation; and,
2. Withdrawal of Plaintiff, Empire State Arms Collectors, from this litigation.

Attached are individual copies of the “Stipulation of Voluntary Dismissal” for these two
Plaintiffs pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). All other Plaintiffs continue. We placed
the “so ordered” block on each Stipulation at page 2. Thank you for your assistance.

Respectfully submitted,
Paloma A. Capanna
Paloma A. Capanna

c.: Aimee Cowan, Esq., NYS Office of the Attorney General (via CM/ECF)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

Nadine Gazzola, individually, and as co-owner, President, and as
BATFE Federal Firearms Licensee Responsible Person for Zero
Tolerance Manufacturing, Inc., *et al.*

Plaintiffs,

-against-

KATHLEEN HOCHUL, in her official capacity as Governor of the
State of New York; STEVEN G. JAMES, in his Official Capacity
as the Superintendent of the New York State Police; ROSSANA
ROSADO, in her Official Capacity as the Commissioner of the
Department of Criminal Justice Services of the New York State
Police; and LETITIA JAMES, in her official capacity as Attorney
General of the State of New York.

Defendants.

**STIPULATION OF
VOLUNTARY
DISMISSAL
PURSUANT TO FED. R.
CIV. P. 41(a)(1)(A)(ii)**

1:22-cv-1134
(BKS/DJS)

To the Clerk of the Court and all parties of record:

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Robert Owens, individually, and as owner and former BATFE FFL Responsible Person for “Thousand Islands Armory,” by and through his counsel, Paloma A. Capanna, and Defendants, by and through their counsel, Letitia James, Attorney General of the State of New York, give notice of a stipulation that Plaintiff Robert Owens, individually, and as owner and former BATFE FFL Responsible Person for “Thousand Islands Armory,” do hereby voluntarily dismiss his claims against Defendants with prejudice and without fees or costs to any party.

All other Plaintiffs, Defendants, and claims remain.

The parties hereby represent that no party hereto is an infant nor an incompetent.

Dated: January 3, 2025 ²⁰²⁵ ~~2024~~ ^{10e}

Dated: January 3, 2025 ~~2024~~

LETITIA JAMES

Attorney General of the State of New York
Attorney for Defendants

By: Paloma A. Capanna
Ms. Paloma A. Capanna, Esq.
Attorney & Policy Analyst
106-B Professional Park Drive
Beaufort, North Carolina 28516
Bar Roll No. 2483469

By: Aimee Cowan
Aimee Cowan, Esq.
Office of the Attorney General
300 S. State Street, Suite 300
Syracuse, New York 13202
Bar Roll No. 516178

Dated: 1 JAN 2025

By: Robert M. Owens
Robert Owens
Owner, Thousand Islands Armory

SO ORDERED:

Brenda K. Sannes,
Chief U.S. District Court Judge

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

Nadine Gazzola, individually, and as co-owner, President, and as
BATFE Federal Firearms Licensee Responsible Person for Zero
Tolerance Manufacturing, Inc., *et al.*

Plaintiffs,

-against-

KATHLEEN HOCHUL, in her official capacity as Governor of the
State of New York; STEVEN G. JAMES, in his Official Capacity
as the Superintendent of the New York State Police; ROSSANA
ROSADO, in her Official Capacity as the Commissioner of the
Department of Criminal Justice Services of the New York State
Police; and LETITIA JAMES, in her official capacity as Attorney
General of the State of New York.

Defendants.

**STIPULATION OF
VOLUNTARY
DISMISSAL
PURSUANT TO FED. R.
CIV. P. 41(a)(1)(A)(ii)**

1:22-cv-1134
(BKS/DJS)

To the Clerk of the Court and all parties of record:

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff non-profit corporation “Empire State Arms Collectors,” by its authorized officer, Mr. James Ingerick, by and through its counsel in this matter, Paloma A. Capanna, and Defendants, by and through their counsel, Letitia James, Attorney General of the State of New York, give notice of a stipulation that Plaintiff “Empire State Arms Collectors” does hereby voluntarily dismiss its claims against Defendants with prejudice and without fees or costs to any party.

All other Plaintiffs, Defendants, and claims remain.

The parties hereby represent that no party hereto is an infant nor an incompetent.

Dated: Jan 3, 2025, 2024

Paloma A. Capanna

By: box SIGN 1J5XX6Y9-4LPYYY59
Paloma A. Capanna, Esq.
Attorney & Policy Analyst
106-B Professional Park Drive
Beaufort, North Carolina 28516
Bar Roll No. 2483469

Dated: _____, 2024

LETITIA JAMES
Attorney General of the State of New York
Attorney for Defendants

By: Aimee Cowan Digitally signed by Aimee Cowan
Date: 2025.01.04 10:54:00 -05'00'
Aimee Cowan, Esq.
Office of the Attorney General
300 S. State Street, Suite 300
Syracuse, New York 13202
Bar Roll No. 516178

Dated: Jan 3, 2025

By: james f ingerick jr
box SIGN 187VY87W-4LPYYY59

Empire State Arms Collectors

By James Ingerick, Director

SO ORDERED:

Brenda K. Sannes,
Chief U.S. District Court Judge